

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No.

1:19-cv-1301-WMR

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Belcalis Marlenis Almánzar (“Almánzar”) and Defendant Latasha Transrina Kebe (“Kebe”) respectfully submit this joint motion to extend deadlines in this matter, and provide as follows:

1. Almánzar filed her complaint against Kebe and Defendant Starmarie Ebony Jones (“Jones”) on March 21, 2019 (ECF No. 1).
2. Almánzar is still attempting to locate and serve Jones.
3. Kebe was served on April 18, 2019, and she filed her answer on May 8, 2019, in which she also asserted a counterclaim (ECF No. 5).

4. Almánzar has notified Kebe of her intention to amend the complaint. The deadline for Almánzar to amend as a matter of course pursuant to Fed. R. Civ. P. 15(a)(1)(B) currently is May 29, 2019.

5. The deadline for Almánzar to answer or otherwise respond to Kebe's counterclaim also currently is May 29, 2019.

6. The deadline to file the parties' initial disclosures and the joint preliminary report and discovery plan currently is June 7, 2019, and discovery also is scheduled to commence on this date.

7. Counsel for Almánzar and Kebe have conferred and are requesting an extension of these deadlines to accommodate their respective work commitments and travel schedules over the upcoming weeks and to address as efficiently as possible alleged deficiencies in Kebe's counterclaim with the hope of avoiding potentially unnecessary motion practice.

8. This extension will also afford Almánzar additional time to locate and serve Jones and obtain her input before submitting the joint preliminary report and discovery plan.

9. Accordingly, the parties request the deadlines be amended as follows:

- a. Almánzar's deadline to amend her complaint as a matter of course pursuant to Fed. R. Civ. P. 15(a)(1)(B) shall be extended from May 29, 2019 to June 12, 2019.
- b. Kebe shall have thirty (30) days, or until July 12, 2019, to file her answer to the amended complaint.
- c. The deadline to answer or otherwise respond to Kebe's counterclaim and the other dates shall be extended as follows:
 - i. If Kebe dismisses her counterclaim on or before July 12, 2019, no response shall be necessary. The parties shall have fourteen (14) days, or until July 26, 2019, to file their initial disclosures and the joint preliminary report and discovery plan, and discovery shall also commence on this date.
 - ii. If Kebe has not dismissed her counterclaim on or before July 12, 2019, Almánzar shall have thirty (30) days, or until August 12, 2019, to answer or otherwise respond to the counterclaim. The parties shall then have fourteen (14) days, or until August 26, 2019, to file their initial

disclosures and joint preliminary report and discovery plan, and discovery shall commence on this same date.

10. The parties have not made a prior request for an extension, and the requested extension will not affect any Court-ordered deadlines in this case.

Respectfully submitted this 24th day of May, 2019.

/s/ W. Andrew Pequignot

Gary P. Adelman

(*pro hac vice* application to be filed)

Sarah M. Matz

(*pro hac vice* application pending)

ADELMAN MATZ P.C.

1173A Second Avenue, Suite 153

New York, New York 10065

(646) 650-2207

g@adelmanmatz.com

sarah@adelmanmatz.com

/s/ Olga Izmaylova (with permission)

Olga Izmaylova

(GA Bar No. 666858)

Sadeer Sabbak

(GA Bar No. 918493)

SABBAK & IZMAYLOVA, P.C.

1875 Old Alabama Road, Suite 760

Roswell, Georgia 30076

(404) 793-7773

olga@silawatl.com

ssabbak@siilawatl.com

Lisa F. Moore

(GA Bar No. 419633)

W. Andrew Pequignot

(GA Bar No. 424546)

MOORE PEQUIGNOT LLC

887 West Marietta Street NW, Suite M-102

Atlanta, Georgia 30318

(404) 748-9596

lisa@themoorefirm.com

andrew@themoorefirm.com

Attorneys for Defendant

Latasha Transrina Kebe

Attorneys for Plaintiff

Belcalis Marlenis Almánzar

CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

DATED: May 24, 2019

/s/ W. Andrew Pequignot
W. Andrew Pequignot
Georgia Bar No. 424546

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2019, I electronically filed the foregoing JOINT MOTION FOR EXTENSION OF TIME with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/ W. Andrew Pequignot
W. Andrew Pequignot
Georgia Bar No. 424546